

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN

Defendant.

No. 1:21-cr-10256-IT

**JOINT MOTION TO AMEND THE PRE-TRIAL ORDER
AND CONTINUE DEADLINES**

The United States of America, by its counsel, and Kingsley Chin, by his counsel, respectfully move this Court to extend the deadline for the filing of (i) written stipulations of any facts that the parties agree are not in dispute; and (ii) a joint exhibit list of all exhibits that a party may offer at trial from today, May 2, 2025, until May 9, 2025.

As to the stipulations, the parties conferred and exchanged drafts of proposed stipulations concerning both the authentication and admissibility of documents and substantive facts related to the case. The parties anticipate conferring further in hopes of reaching stipulations which will streamline the case and eliminate the need for evidence or argument concerning facts that are not reasonably in dispute.

As to the exhibit list, the parties have exchanged exhibits and exhibit list, but require additional time to confer regarding exhibit objections, to prepare a joint list of exhibits for the Court, and to prepare a set of exhibits for submission to the Court.

Accordingly, the parties request a brief continuance, until May 9, 2025, of the deadlines for submission of stipulations and a joint exhibit list to the Court.

<p>KINGSLEY CHIN</p> <p>By his attorneys,</p> <p><u>/s/ Barry S. Pollack</u></p> <p>Barry S. Pollack (BBO #642064) Joshua L. Solomon (BBO #657761) POLLACK SOLOMON DUFFY LLP 31 St. James Avenue, Suite 940 Boston, MA 02116 (617) 439-9800</p>	<p>LEAH B. FOLEY United States Attorney</p> <p><u>/s/ Chris Looney</u></p> <p>ABRAHAM R. GEORGE CHRISTOPHER LOONEY MACKENZIE A. QUEENIN Assistant U.S. Attorneys 1 Courthouse Way John Joseph Moakley U.S. Courthouse Boston, MA 02210 (617) 748-3100</p>
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Dated: XXX

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused this document to be filed through the ECF system on May 2, 2025.

/s/ Christopher Looney
CHRISTOPHER LOONEY